

CRIMINAL COMPLAINT

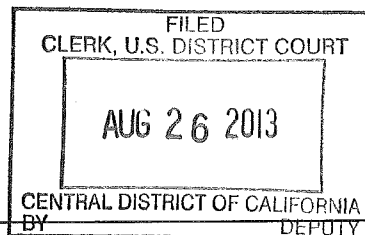
UNITED STATES DISTRICT COURT	CENTRAL DISTRICT OF CALIFORNIA
UNITED STATES OF AMERICA v. LUIS RICARDO RODRIGUEZ	DOCKET NO. MAGISTRATE'S CASE NO. 013- M 13 02380

Complaint for violation of Title 18, United States Code, Section 879

NAME OF MAGISTRATE JUDGE Victor B. Kenton	UNITED STATES MAGISTRATE JUDGE	LOCATION
DATE OF OFFENSE May 19 2012	PLACE OF OFFENSE Los Angeles County	ADDRESS OF ACCUSED (IF KNOWN) 23701 S. Western Ave, #104 Torrance, California

[18 U.S.C. § 879]

On May 19, 2012, LUIS RICARDO RODRIGUEZ, did knowingly and willfully threaten to kill and inflict bodily harm upon a member of the immediate family of a former President of the United States, in violation of 18 U.S.C. § 879.



BASIS OF COMPLAINANT'S CHARGE AGAINST THE ACCUSED:

(See attached affidavit which is incorporated as part of this Complaint)

MATERIAL WITNESSES IN RELATION TO THIS CHARGE:

Being duly sworn, I declare that the foregoing is true and correct to the best of my knowledge.	SIGNATURE OF COMPLAINANT
	OFFICIAL TITLE SA Jay C. Huang United States Secret Service

Sworn to before me and subscribed in my presence,

SIGNATURE OF MAGISTRATE JUDGE(1) VICTOR B. KENTON	DATE August __, 2013
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1) See Federal Rules of Criminal Procedure rules 3 and 54.

AUSA CLS:se *CLS*

AFFIDAVIT

I, Jay C. Huang, being duly sworn, depose and state:

I. INTRODUCTION

1. I am employed as a Special Agent ("SA") with the United States Secret Service ("USSS") and have been so employed since 2004. During such employment, I have investigated numerous cases involving criminal threats to kill, injure, obstruct, impede, and intimidate individuals protected by the USSS, to include President Barack Obama and his immediate family, and former Presidents and their immediate families. Since December of 2012, I have been assigned to the Federal Bureau of Investigation ("FBI") – Joint Terrorism Task Force, which authorizes me to investigate threats pertaining to national security.

II. PURPOSE OF AFFIDAVIT

2. This affidavit is made in support of an arrest warrant and criminal complaint charging LUIS RICARDO RODRIGUEZ ("RODRIGUEZ") with a violation of Title 18, United States Code, Section 879, knowingly and willfully threatening to kill or inflict bodily harm upon a former President or immediate family member of the President or of any former President.

3. Additionally, this affidavit is made in support of a search warrant for RODRIGUEZ's residence, 23701 S. Western Avenue, Space #104, Torrance, California ("SUBJECT PREMISES"; described in detail in below and in Attachment A) for the items to be seized (described in Attachment B) which are evidence of violations of Title 18, United States Code, Section 871 (knowingly and willfully making any threat to kill or inflict bodily harm upon the President), Section 879 (knowingly and willfully threatening to kill or inflict bodily harm upon a former President or immediate family member of the President or of any former President), Section 875(c) (transmitting in interstate commerce any communication containing any threat to injure a person), Section 1751 (attempting or conspiring to kill or assault the

President), Section 373 (solicitation to commit a crime of violence), Section 1114 (killing or attempting to kill an officer or employee of the United States), and Section 115(a)(1)(A) (threatening to assault or murder a federal law enforcement officer, or officer employed by the United States).

4. The facts set forth in this affidavit are based upon my personal involvement in this investigation, my training and experience, my review of relevant evidence, and information obtained from other law enforcement officers. This affidavit is intended to show merely that there is sufficient probable cause for the requested warrant and does not purport to set forth all of my knowledge of or investigation into this matter. Unless specifically indicated otherwise, all conversations and statements described in this affidavit are related in substance and in part only.

III. TRAINING AND EXPERIENCE

A. USSS Training and Experience

5. In November 2004, I completed the USSS Special Agent Training Program in Beltsville, Maryland. This consisted of training on protective intelligence and threat assessment investigations. During my training, I was provided instruction related to individuals who have attacked or attempted to attack prominent public officials and prominent figures. From this instruction and other readings of studies during my career, I know the majority of assassins and near-lethal attackers were known to have spoken or written in a manner suggesting that they were considering an attack. Typically, the would-be attackers often wrote down their ideas in journals or diaries, which they kept at their residences.

6. I have been involved in over thirty investigations and assessments of persons who exhibited threatening or inappropriate interest in the President of the United States and family, and Former Presidents of the United States and family. I know from my training and experience

that individuals in the past would write down their ideas or threats. However, in recent years, I know that many of the threats are composed by using computers and communicated through emails or other internet-based forms of communication, such as public online fora or social media. In some cases, the authors of these threats will print out and retain the messages in lieu of writing them down; in other cases, they may retain digital copies.

B. Training and Experience on Digital Devices

7. As used herein, the term “digital device” includes any electronic system or device capable of storing or processing data in digital form, including central processing units; desktop, laptop, notebook, and tablet computers; personal digital assistants; wireless communication devices, such as telephone paging devices, beepers, mobile telephones, and smart phones; digital cameras; peripheral input/output devices, such as keyboards, printers, scanners, plotters, monitors, and drives intended for removable media; related communications devices, such as modems, routers, cables, and connections; storage media, such as hard disk drives, floppy disks, memory cards, optical disks, and magnetic tapes used to store digital data (excluding analog tapes such as VHS); and security devices. Based on my knowledge, training, and experience, as well as information related to me by agents and others involved in the forensic examination of digital devices, I know that data in digital form can be stored on a variety of digital devices and that during the search of a premises it is not always possible to search digital devices for digital data for a number of reasons, including the following:

a. Searching digital devices can be a highly technical process that requires specific expertise and specialized equipment. There are so many types of digital devices and software programs in use today that it is impossible to bring to the search site all of the necessary technical manuals and specialized equipment necessary to conduct a thorough search. In

addition, it may be necessary to consult with specially trained personnel who have specific expertise in the types of digital devices, operating systems, or software applications that are being searched.

b. Digital data is particularly vulnerable to inadvertent or intentional modification or destruction. Searching digital devices can require the use of precise, scientific procedures that are designed to maintain the integrity of digital data and to recover "hidden," erased, compressed, encrypted, or password-protected data. As a result, a controlled environment, such as a law enforcement laboratory or similar facility, is essential to conducting a complete and accurate analysis of data stored on digital devices.

c. The volume of data stored on many digital devices will typically be so large that it will be highly impractical to search for data during the physical search of the premises. A single megabyte of storage space is the equivalent of 500 double-spaced pages of text. A single gigabyte of storage space, or 1,000 megabytes, is the equivalent of 500,000 double-spaced pages of text. Storage devices capable of storing 500 or more gigabytes are now commonplace. Consequently, just one device might contain the equivalent of 250 million pages of data, which, if printed out, would completely fill three 35' x 35' x 10' rooms to the ceiling. Further, a 500 gigabyte drive could contain as many as approximately 450 full run movies or 450,000 songs.

d. Electronic files or remnants of such files can be recovered months or even years after they have been downloaded onto a hard drive, deleted, or viewed via the Internet. Electronic files saved to a hard drive can be stored for years with little or no cost. Even when such files have been deleted, they can be recovered months or years later using readily-available forensics tools. Normally, when a person deletes a file on a computer, the data contained in the

file does not actually disappear; rather, that data remains on the hard drive until it is overwritten by new data. Therefore, deleted files, or remnants of deleted files, may reside in free space or slack space, i.e., space on a hard drive that is not allocated to an active file or that is unused after a file has been allocated to a set block of storage space, for long periods of time before they are overwritten. In addition, a computer's operating system may also keep a record of deleted data in a swap or recovery file. Similarly, files that have been viewed on the Internet are often automatically downloaded into a temporary directory or cache. The browser typically maintains a fixed amount of hard drive space devoted to these files, and the files are only overwritten as they are replaced with more recently downloaded or viewed content. Thus, the ability to retrieve residue of an electronic file from a hard drive depends less on when the file was downloaded or viewed than on a particular user's operating system, storage capacity, and computer habits. Recovery of residue of electronic files from a hard drive requires specialized tools and a controlled laboratory environment. Recovery also can require substantial time.

e. Although some of the records called for by this warrant might be found in the form of user-generated documents (such as word processing, picture, and movie files), digital devices can contain other forms of electronic evidence as well. In particular, records of how a digital device has been used, what it has been used for, who has used it, and who has been responsible for creating or maintaining records, documents, programs, applications and materials contained on the digital devices are, as described further in the attachments, called for by this warrant. Those records will not always be found in digital data that is neatly segregable from the hard drive image as a whole. Digital data on the hard drive not currently associated with any file can provide evidence of a file that was once on the hard drive but has since been deleted or edited, or of a deleted portion of a file (such as a paragraph that has been deleted from a word

processing file). Virtual memory paging systems can leave digital data on the hard drive that show what tasks and processes on the computer were recently used. Web browsers, email programs, and chat programs often store configuration data on the hard drive that can reveal information such as online nicknames and passwords. Operating systems can record additional data, such as the attachment of peripherals, the attachment of USB flash storage devices, and the times the computer was in use. Computer file systems can record data about the dates files were created and the sequence in which they were created. This data can be evidence of a crime, indicate the identity of the user of the digital device, or point toward the existence of evidence in other locations. Recovery of this data requires specialized tools and a controlled laboratory environment, and also can require substantial time.

f. Further, evidence of how a digital device has been used, what it has been used for, and who has used it, may be the absence of particular data on a digital device. For example, to rebut a claim that the owner of a digital device was not responsible for a particular use because the device was being controlled remotely by malicious software, it may be necessary to show that malicious software that allows someone else to control the digital device remotely is not present on the digital device. Evidence of the absence of particular data on a digital device is not segregable from the digital device. Analysis of the digital device as a whole to demonstrate the absence of particular data requires specialized tools and a controlled laboratory environment, and can require substantial time.

IV. PREMISES TO BE SEARCHED

8. The premises to be searched is described as follows:

a. SUBJECT PREMISES: 23701 S. Western Avenue, Space #104,

Torrance, California 90501; including any closets, offices, and storage structures on that property

associated with SUBJECT PREMISES. SUBJECT PREMISES is a manufactured single story mobile home found within the "Knolls Lodge" Trailer Park on Avenue C. Exterior of SUBJECT PREMISES is tan in color with brown trim. There is a white mailbox located at the southeast corner of SUBJECT PREMISES. The space number "104" is white in color and is painted on the roadway on the east side of SUBJECT PREMISES. There are two entrances, each located on the south side of SUBJECT PREMISES, and both face south into the attached carport. The main entrance, located on the southeast side of SUBJECT PREMISES, consists of an approximate six foot wide sliding glass door with white vertical blinds hanging on the interior side of the door. The secondary entrance is located on the southwest side of SUBJECT PREMISES and consists of a tan colored metal door with a dead bolt lock. There is a detached storage shed located at the west end of the attached carport; adjacent to the secondary entrance of SUBJECT PREMISES. The storage shed is reddish and brown in color and is approximately eight feet high.

V. SUMMARY OF PROBABLE CAUSE

9. In May of 2012, RODRIGUEZ sent emails to President Obama's campaign headquarters and the Clinton Foundation containing threats and other menacing statements toward the following individuals: President Barack Obama ("Obama") and his family, Former President George W. Bush ("Bush"), Former President William Clinton ("Clinton"), Former First Lady Hillary Clinton, and Former President Clinton's daughter, Chelsea Clinton.

10. Also in May of 2012, RODRIGUEZ sent emails to the embassies of Syria, Pakistan, Iraq, and Lebanon; he also sent very similar emails to email accounts maintained on

behalf of Hamas¹ and Hezbollah², both designated as Foreign Terrorist Organization (“FTO’s”). In all of these emails, RODRIGUEZ encouraged these entities to kill many of the above-listed individuals and to attack the United States in other ways. RODRIGUEZ threatened to personally send anthrax³ and letter bombs through the mail system, and encouraged these entities to use poison, bombs, polonium (a highly radioactive element), and VX gas (a toxic nerve agent) against the above-mentioned targets.

11. From November 2012 to May 2013, an FBI Employee (“FBI Employee #1”) and RODRIGUEZ engaged in email correspondence. The content of the emails sent by RODRIGUEZ to FBI Employee #1 is consistent with those he sent to President Obama’s Campaign Headquarters, the Clinton Foundation, and the foreign entities in May 2012. RODRIGUEZ expressed to FBI Employee #1 on numerous occasions his desire to incite terrorists to attack the United States, Obama and his family, Clinton and his family, and Bush and his family, and to assist them in doing so. Furthermore, through the email correspondence, RODRIGUEZ advised FBI Employee #1 that he conducted reconnaissance and prepared attack plans on numerous targets throughout the Los Angeles area. As described below, RODRIGUEZ also arranged through FBI Employee #1 to meet with another FBI employee (“FBI Employee #2”), who he believed was an individual interested in conducting violent attacks in the United

¹ Hamas was established in late 1987 as an outgrowth of the Palestinian branch of the Muslim Brotherhood. It is a Palestinian terrorist organization located primarily in the West Bank and Gaza Strip which advocates the destruction of Israel.

² Hezbollah is an Islamic terrorist organization established in 1982 that seeks the destruction of Israel and the establishment of an Islamic State encompassing both Lebanon and Israel. The full name of Hezbollah is “Hezbollah, the Islamic Resistance in Lebanon.”

³ Presumably, the bacterium: anthrax is an infectious lethal disease caused by the bacterium *Bacillus anthracis*.

States. In his interactions with FBI Employee #2, RODRIGUEZ discussed locations in the Los Angeles area that he believed would be good targets for such an attack.

VI. PROBABLE CAUSE

C. Background on RODRIGUEZ

12. RODRIGUEZ is a United States citizen born in 1963, in Cuba. He currently resides in Torrance, California.

13. RODRIGUEZ enrolled at the University of California, Los Angeles (UCLA) in the summer term of 1984 and last took courses during the winter term of 1997. RODRIGUEZ completed 252 credits, primarily in chemistry, physics, and Soviet/Russian studies.

14. According to Los Angeles County Department of Mental Health ("LACDMH") workers who have examined RODRIGUEZ or are familiar with information about RODRIGUEZ, RODRIGUEZ has been diagnosed with schizophrenia and bi-polar disorder and suffers from delusions. According to the mental health workers, RODRIGUEZ's delusions are held as deep convictions and are nearly impossible to be changed or swayed. The mental health workers explained that RODRIGUEZ's deep hatred for Clinton is unlikely to diminish and he is and will remain convinced that Bill and Hillary Clinton are responsible for his dismissal from his employment at the Harbor-UCLA Medical Center.

15. The LACDMH mental health workers believe that despite RODRIGUEZ's mental illness, RODRIGUEZ is able to care for himself, make and execute plans, and function independently without any assistance other than financial welfare. Furthermore, another mental health worker who is familiar with RODRIGUEZ's mental illness history and who has personally interviewed RODRIGUEZ believes RODRIGUEZ is motivated to and capable of carrying out a violent attack, were an opportunity to do so to present itself.

16. Based on my training and experience as a USSS SA, coupled with the above information, I believe the fact that RODRIGUEZ suffers from mental illnesses does not diminish him as a threat nor prevent him from inciting and carrying out attacks.⁴

D. Threatening Communications to Protected Persons

17. On June 5, 2012, USSS Protective Intelligence Research Specialist (PIRS) Stephanie Phillips, based in Washington, D.C., contacted the USSS Los Angeles Field Office (LAFO) regarding RODRIGUEZ. PIRS Phillips advised that RODRIGUEZ had sent several emails to President Obama's Campaign Headquarters containing threats against Obama and family, Bush, and Clinton and family.

18. One of the emails acquired by the USSS indicated that on May 10, 2012, an email was sent from the email address rodriguez.iscooter@gmail.com ("Subject Account 1") to info@barackobama.com⁵ ("Obama Campaign"). Documents that I reviewed from Google Inc. indicated the name listed for this email account is "Luis Rodriguez." The account was created on September 11, 2007. This email contained the following statements⁶:

- a. "i do not give a f*** about faggots getting married or faggots marrying iguanas. What i do give f*** about is killing Hillary Clinton DEAD, so that bill clinton does a have major problem taking the white house in 2016 or 2013. oreobama gets re-elected and biden steps down so hillary and bill clinton won't kill him or oreobama. but if i KILL HILLARY CLINTON and BILL CLINTON DEAD, he will have a much harder time getting to the white house ... i will kill you DEAD

⁴ Based on studies and publications that I have reviewed, I know that a majority of mass shootings in recent years have been carried out by individuals who have demonstrated signs of continuous behavioral health issues and mental illness.

⁵ The email address info@barackobama.com was used by the 2012 Obama Presidential Election Campaign to disseminate and receive information from the public regarding the 2012 United States Presidential election and is directly associated with Obama.

⁶ RODRIGUEZ's emails are quoted verbatim throughout the affidavit, with the exception of certain expletives, which display only the first letter of the word; grammatical and spelling mistakes are in their original form. Ellipses, however, indicate elisions in the text unless otherwise specified.

hillaryclinton i have a rabid and morbid hatred of you and bill clinton. i am more than willing to risk and lose my life to kill you DEAD you stupid ignorant whore, hillary clinton. i will step it up, by sending you letter bombs at the state department and by sending letter bombs to the clinton foundation. i will send you anthrax in the mail you stupid c***, hillary clinton.”

19. A second email string acquired by the USSS indicated that on May 10, 2012 at approximately 11:15 a.m., an email with the subject line “Al Qaeda Bombmaker Designs Bombs to Hide in Cameras, Hard Drives and Pets — ABC News” and containing a link to a news story of the same title was sent from email address lrrodriguez3@aol.com (“Subject Account 2”) to luis.rodriguez40@yahoo.com (“Subject Account 3”). I have reviewed documents from America Online (AOL) regarding Subject Account 2, which indicated the name listed for this email account is “Luis Rodriguez,” with an address of 23701 S. Western Avenue, Torrance, CA (i.e. the SUBJECT PREMISES). As discussed below, this is the residence of RODRIGUEZ, where he has been interviewed by law enforcement agents. The account was created on September 11, 2007 (i.e. the same date as Subject Account 1). I have also reviewed documents from Yahoo!, Inc. which indicated the name listed for Subject Account 3 is also “Luis Rodriguez.” This account was created on November 11, 2007. Based on this information and my knowledge of the investigation, I believe that RODRIGUEZ often forwards information to himself between various email accounts he controls.

20. The above email was subsequently forwarded on May 10, 2012 at 11:47 a.m. from Subject Account 3 to luisrodriguezl@gmx.com (“Subject Account 4”), Obama Campaign, enews@clintonfoundation.org⁷ (“Clinton Foundation”), english@moqawama.org⁸,

⁷ Enews@clintonfoundation.org is the email address associated with the website www.clintonfoundation.org. According to the website, the Clinton Foundation was created in 2001 by Former President Clinton to improve global health and to strengthen economies.

english@alqassam.ps⁹, info@embassyofpakistanusa.org¹⁰, as well as additional email addresses belonging to multiple foreign governments such as Syria, Iraq, Iran, Afghanistan, and Lebanon. I have reviewed documents from the provider of Subject Account 4, GMX Internet Service, Inc., which indicated the name listed for Subject Account 4 is "Luis Rodriguez," with a date of birth that is the same as RODRIGUEZ's. This account was created on August 2, 2009. Based on the above information and my knowledge of this investigation, I believe that RODRIGUEZ is the user of Subject Accounts 1 through 4, and that he wrote and sent the emails described herein from each of these accounts.

21. The body of the email described in the previous paragraph contained the following statements:

- a. "i took chemistry 215c at ucla in spring of 97, BEFORE this f***ing c*** whore Hillary clinton and bill clinton began to destroy my life."
- b. "i would love to help mujaheddin in bomb making and i would consider it an honor to work for any jihadist cause, even though i am not a Muslim. i would earnestly take ghoulish pleasure in designing better bombs that could target and kill more americans any where in the world. i am doing this in retaliation for what bill and hillary clinton did to me at harbor/ucla and what the bush clan did to me during the bush years, where I have been a whipping boy of the executive branch, while the people entrusted to protect my civil rights, the FBI and DOJ, sit on their thumbs. i would love to help any jihadist cause in the assembly and engineering of bombs and chemicals that could target and kill Americans...i hate the united states with a great deal of apssion [passion] and would gladly leave the country and render my services to any jihadist cause."

⁸ English@moqawama.org is the email address associated with the website www.english.moqawama.org. The website homepage displays the heading "Islamic Resistance in Lebanon — Official Website" and the Hezbollah flag.

⁹ English@alqassam.ps is the email address associated with the website www.qassam.ps. The website is an English-language site for the IQB, which is the military wing of Hamas.

¹⁰ Info@embassyofpakistanusa.org is the email address associated with the website www.embassyofpakistanusa.org, which is the official website of the Islamic Republic of Pakistan.

- c. "again, i am willing to help aNY mujaheddin int ehmaking of chemical biological radioactive or conventional weapons. i would considerit an honor to risk my life and eevn lose my life by helping mujaheddin construct weapons that could harm Americans any where in the world."

22. On May 11, 2012, RODRIGUEZ again forwarded the same email, this time from Subject Account 3 to Subject Account 1. No additional text was contained in the body of that email. Then, on the same date, RODRIGUEZ forwarded the entire email string yet again, from Subject Account 1 to the Obama Campaign, and made additional statements in the body of the email, including the following:

- a. "This is for Hillary and Bill Clinton: IF you do anything like you did with me at Harbor/UCLA, Ann Marie Donnelly PhD, I will begin to send you DAILY DEATH THREATS and I will send them to Homeland Security, and I will NEVER stop!. I will aslo begin filing regular complaints with the the FBI on line and I will give them details on how I want FBI, CIA and law enforcement DEAD, along with HILLARY and Bill Clinton! And I will NEVER stop! I was 35 when I called the FBI in December of 98. I am approaching 49 and have endured great stress and hardship so the f***ing c*** Hillary Clinton and her asshole pig husband Bill Clinton can destroy my life and I do not even know WHY! So I will again threaten to send anthrax through regular mail and letter bombs through regular mail in order to kill Hillary Clinton at the State Department. I hate Bill and Hillary Clinton enough where I do not care what happens."
- b. "Killing Hillary Clinton and Bill Clinton and inciting their assassinations by Mujaheddin is worth dying for. I would love to see Hillary Clinton assassinated with a bomb or polonium and I live solely for the purpose of killing Bill Clinton with polonium[.] Killing George W. Bush is worth dying for also; as is killing Barack Obama and his entire n***** and honky family."
- c. RODRIGUEZ stated that Roger Clinton¹¹ had connections to the Gambino crime family and indicated that he knew the community in which Roger Clinton lived¹². RODRIGUEZ continued, "That is why I want Hillary Clinton and Bill Clinton to be killed by Mujaheddin with polonium or VX gas and I am inciting their assassinations."

¹¹ Roger Clinton is the half-brother of Former President William Clinton.

¹² I am aware that this community is readily accessible to RODRIGUEZ.

- d. "Since America denies me my civil rights, and law enforcement does not care, I want to see America—the USA—come under attack by Mujaheddin."

23. A third email string acquired by the USSS indicated that on May 19, 2012 at 11:53 a.m., RODRIGUEZ sent an email message with the subject line, "3 face terror charges after Chicago apt. raid" from Subject Account 3 to Subject Account 1. On May 19, 2012 at 11:56 a.m., RODRIGUEZ forwarded this email from Subject Account 1 back to Subject Account 3 and then later forwarded it from Subject Account 3 to the Obama Campaign. This final email contained the following statements:

- a. "Luis Rodriguez

SSN# [xxx-xx]-1946 [RODRIGUEZ's true social security number]

CALIFORNIA DRIVER LICENSE C0614618 [RODRIGUEZ's true California driver's license number]

23701 S. WESTERN AVE. TORRANCE CALIFORNIA 90501-7007

SPACE #104 [i.e., SUBJECT PREMISES]

I HAVE NO PHONE.

LAW ENFORCEMENT SHOULD REFER TO ALL MY PREVIOUS EMAILS BEFORE CONTACTING ME, PLEASE. I DON'T LIKE WASTING MY TIME BY HAVING YOU ASK ME STUPID QUESTIONS. MY ENTIRE STORY CHECKS OUT!!! I AM THREATENING THE LIFE OF HILLARY AND BILL CLINTON IN RETALIATION FOR HIS VISIT TO HARBOR/UCLA ON 7/9/99. I AM ACCUSING THEM OF BEING BEHIND MY PROBLEMS AT HARBOR/UCLA STARTING IN DECEMBER OF 98."

- b. "...I want you DEAD Hillary Clinton. I want to kill you DEAD like Barbara Olson or Nicole Simpson. I prefer to kill you myself with a crowbar so I can bust your f***ing knee caps then break every f***ing bone in your c***-faced whore body. After that I would break open your f***ing skull to finish you off. I would love to kidnap your c*** daughter Chelsea Clinton and make a snuff video of her like what was done to Daniel Pearl. Then I would kill Bill Clinton the same way I want to kill Hillary Clinton. An acid bomb would also cause me to leap for joy, you f***ing c***. I would love to help mujaheddin assemble an acid bomb to kill you DEAD, Hillary Clinton and Bill Clinton. I WANT TO ASSASSINATE BOTH OF YOU DEAD. Mujaheddin should concentrate their efforts on targeting Hillary and Bill Clinton for death and mutilation. Chelsea Clinton killed in a horrific way would also be justifiable. These pigs orchestrated the 9/11 attacks and

it allowed for the butchery of tens of thousands of innocent Muslims. They, the Clintons, should pay by being blown up or poisoned by any means necessary. I willing to help any Mujheddin from the Umma in order to attck and kill Hillary Clinton and Bill Clinton, as well as any other attacks on the USA and Israel. George W. Bush and his entire family should also be targeted for death by Mujaheddin. Barack Obama getting blown to hell along with his entire family does not bother me. However, it would end the Clinton's hopes for power by killing the Clintons DEAD first."

E. Interview with RODRIGUEZ

24. On June 5, 2012, USSS SA's Andrew Zuk and Stephanie Hancock interviewed RODRIGUEZ at his home, SUBJECT PREMISES (as indicated in the above email). I have spoken to SA Zuk regarding the interview and reviewed his investigative report. I learned the following:

a. RODRIGUEZ readily confessed to sending threatening emails to the Obama Campaign. RODRIGUEZ claimed his motivation for sending the emails was the loss of his job at Harbor/UCLA Hospital in 2000. RODRIGUEZ believed he lost his job after voicing his belief that Bill Clinton was involved in the O.J. Simpson murder investigation in an unspecified role. RODRIGUEZ also made several claims that Hillary Clinton, Jimmy Carter, Ronald Reagan, and George W. Bush were involved in harassment which had prevented him from getting a job since 2000. RODRIGUEZ also expressed strong beliefs in several different conspiracies involving the aforementioned individuals and organized crime. RODRIGUEZ claimed that as a result of the "evidence" he had uncovered during his Internet research documenting these connections and conspiracies, he was the victim of government-sponsored harassment.

b. RODRIGUEZ stated he sees a psychiatrist approximately once every three months since being diagnosed with Attention Deficit Hyperactivity Disorder (ADHD).

RODRIGUEZ stated he was compliant with the prescribed medications (Restoril and Wellbutrin). RODRIGUEZ stated he has never been diagnosed with any mental illness other than ADHD.

c. When questioned about his statement about Roger Clinton's place of residence, RODRIGUEZ stated he had conducted research on Wikipedia regarding Bill Clinton, and learned of Roger Clinton's residence. RODRIGUEZ denied ever attempting to contact Roger Clinton or learn his specific address.

d. When questioned regarding the specificity of his emailed threats (the use of polonium, etc.), RODRIGUEZ stated he mentioned the use of polonium because of his previous experience working in chemistry labs. RODRIGUEZ stated he did not possess any knowledge regarding the actual construction of explosives or use of chemicals for violent purposes.

e. RODRIGUEZ stated he attended UCLA, majoring in chemistry and Russian Literature. RODRIGUEZ described himself as an "almost graduate" of UCLA and stated he had taken a law course at Harvard University.

f. RODRIGUEZ was cooperative throughout the interview and only became agitated and angry when asked about the Clintons.

F. TOPIX Threats

25. On August 20, 2012, Diplomatic Security Services (DSS) SA Michael Peart provided USSS SA Adam Kamann a copy of an email sent on August 17, 2012 from Subject Account 2 to the Clinton Foundation, as well as various embassies and consulates, including those of Syria, Afghanistan, Pakistan, Lebanon, Jordan, Iran, Iraq, Kuwait, and Cuba, as well as the email addresses associated with FTO's such as Hamas, Hezbollah, and the Popular Front for

the Liberation of Palestine. I have reviewed the email, which contains the following additional menacing statements regarding the Clintons:

- a. "If you Google 'kill Hillary Clinton Dead Topix', you will see the postings that I have been posting for MONTHS! I have also posted 'Kill Bill Clinton at the Hollywood Bowl' On the Washington DC Forum of Topix. It vanished for some strange reason. More Clintonian cover ups. I am sending this email in order to establish a pattern of abuse and cover up by the criminal justice system. My motivation for inciting the assassinations of American presidents and their families as well as inciting acts of terrorism against the USA is to exact revenge for what Bill and Hillary Clinton did of me going back to late 98, and what was done to me BEFORE, DURING, and AFTER Bill Clinton's visit to Harbor/UCLA on 7/9/99...I want to incite the deaths of more USA troops and citizens the world over. I want to incite the assassination of Hillary and Bill Clinton. I HAVE TURNED TO INCITING TERRORISM AGAINST THE USA BECAUSE THE AMERICAN LEGAL SYSTEM HAS ALLOWED THE AMERICAN PRESIDENTS TO DESTROY MY LIFE AND DEPRIVE ME OF JUSTICE! THEREFORE, MUJAHEDIN SHOULD KILL MORE AMERICANS...I WANT TO FURTHER INCITE MUJAHEDIN TO KILL BILL AND HILLARY CLINTON DEAD. I AM WILLING TO HELP ANY MUJAHEDDIN WITH MAKING BOMBS TO KILL AMERICANS IN A CHEMISTRY LAB! I HAVE THE EDUCATION THAT WAS RUINED BY THE CLINTONS. I COULD HAVE BEEN ON WALL STREET OR IN THE OIL BUSINESS. BILL AND HILLARY CLINTON MADE ME THEIR WETBACK FOR LIFE. I WANT THEM ASSASSINATED! I WOULD LOVE TO SEE CHELSEA CLINTON ASSASSINATED FIRST SO THEY CAN SUFFER MORE!!!!"

26. I conducted a Google search of "Kill Hillary Clinton Dead Topix" and located a thread titled "Kill Hillary Clinton DEAD" in the "Washington, DC Forum" of www.topix.com¹³.

The thread contained the following information:

- a. The first post was dated October 24, 2011. The poster's name was "Atomic Jihad" from "Los Angeles." The post from Atomic Jihad stated the following: "That

¹³ www.topix.com is a discussion board website which allows posters, using anonymous accounts, to comment on news articles and initiate discussions of various topics.

bitch has destroyed the lives of plenty of people. She enjoys destroying lives and degrading people, reducing them to PERMANENT second-class citizens, through executive orders, then establishing indirect contact to communicate with them so they can not prove her abuse. They are denied justice. She uses subtle hints and suggestions demanding that they bow to her will. If Chelsea Clinton, her only daughter, were killed first, it would make an example of this monster of ego. It would be extraordinary joy for many to see the Clintons attend the funeral of their only daughter, Chelsea Clinton. They have ruined, tortured and tormented the lives of many individuals inside the US without any access to justice. This calls for violent overthrow of the established order by assassination.”¹⁴

b. On March 12, 2012, a user posting under the name “Kill Chelsea Clinton” in “Los Angeles, CA,” quoted “Atomic Jihad’s” post and responded as follows: “killing chelsea clinton, then waiting for a while to kill billary clinton would make an example of them. The next time an American political dynasty does that to people inside usa soil with the FULL KNOWLEDGE of the justice department, they KNOW they will pay a heavy price...”

c. On April 21, 2012, a poster named “Luis Rodriguez” from “Los Angeles, CA” posted that he was “Atomic Jihad” (and also the user posting under the name “Islamic Jihad”) and that he was the one who started the thread. The poster then wrote several convoluted statements related to the O.J. Simpson case, the Gambino crime family, and the Clintons. The poster also wrote the following:

¹⁴ In response to this post, another user posting under the name “Reality Check” wrote, “Threatening the government officials of the United States is a serious crime under federal law. Threatening the President of the United States is a Class D felony under 18 U.S.C. § 871, punishable by 5 years of imprisonment, that is investigated by the United States Secret Service...Threatening federal officials’ family members is also a federal crime.”

i. "I want to kill Bill and Hillary Clinton in a horrific way. The FBI does not answer my complaints because of Bill and Hillary Clinton... I am publicly inciting jihadists and Mujaheddin to kill and Hillary Clinton for what they did to me. You can post all sorts of sarcastic dribble calling me a nut. I don't care. Report it to Homeland Security or the Secret Service if you have any balls. They know where to find me. I have been denied justice. I DO NOT believe in forgiving or turning the other cheek. I believe in exacting revenge. I would love to help any Mujaheddin who wants to target and kill Bill and Hillary Clinton or George W. Bush for what they did to me for decades. I prefer to kill Hillary Clinton FIRST so Bill Clinton will have a harder time getting into the White House. I would love to see Hiallry Clinton dismembered or chocke on vx gas. i would be willing to help jihadists poisn Bill Clinton with polonium radio isotope so he can die like Alexander Litvenienko.¹⁵ I have the educational background to do all this."

d. Continuing on April 21, 2012, another post posted under the username "Luis Rodriguez" stated that the user used to live at "829 N. Alta Visa, LA California, 90046."¹⁶ In addition, the post contained the following statements: "When I moved back to Torrance George W. Bush visited Robinson helicopetr in Torrance in late january fo 2008,¹⁷ just four days AFTER i activated my library records at Torrance public library. Look at my library records. Pleasea do not bother me with stupid questions. I am NOT armed or violent. I prefer using science to kill Bill and Hillary Clinton and George W. Bush."

¹⁵ Alexander Litvenienko was a former officer of the Russian Federal Security Service. In 2006, Litvenienko died unexpectedly and under suspicious circumstances. It was later determined that Litvenienko died of polonium poisoning.

¹⁶ 829 N. Alta Vista Blvd. #33, Los Angeles, CA 90046 was listed as one of RODRIGUEZ's prior addresses on his credit report.

¹⁷ According to USSS records, I know that on January 30, 2008, Former President George W. Bush visited Robinson Helicopter Company in Torrance, CA.

G. FBI Investigation

27. On October 30, 2012, FBI and Los Angeles Police Department (LAPD) personnel spoke with RODRIGUEZ at SUBJECT PREMISES. I reviewed the FBI's investigative report and learned the following:

a. RODRIGUEZ admitted that he sent emails to Obama and Clinton threatening their lives. RODRIGUEZ said that Bill and Hillary Clinton were responsible for getting him fired from his job as a pharmacy technician at the Harbor-UCLA Medical Center and he continues to be extremely upset over the injustices the Clintons and the United States have perpetrated upon him.

b. RODRIGUEZ admitted he has posted Facebook messages encouraging terrorist organizations to attack the United States, and has sent email messages to Hezbollah, Hamas, and foreign governments such as Pakistan and Iran encouraging them to commit terrorist acts against the United States. RODRIGUEZ explained that the emails are means to embarrass the United States and to force the issue of the United States federal government paying attention to his complaints. When asked to explain the significance of the groups he emailed and referenced on his Facebook page and in Facebook comments, RODRIGUEZ explained that Hezbollah is a Lebanese terrorist organization and that Hamas operates in the occupied territories and stands for the Islamic Resistance Movement.

28. The FBI obtained search warrants for Subject Accounts 1 through 4, from or through which RODRIGUEZ sent the above-described communications. The results of these search warrants revealed, among other things, that RODRIGUEZ sent multiple emails to Al

Qaeda in the Arabian Peninsula's *Inspire* Magazine¹⁸ in 2012 using Subject Account 3. These emails to *Inspire* included his promises to "do more scouting of the jewish center in lomita for a firebomb and greande attack as well as drive by shootings by mujaheddin," and confessions that "dying for a martyrdrom mission that will kill and injure thousands of americans is an honorable death for me." Further, RODRIGUEZ stated in his emails to *Inspire* that it would give him "great pleasure to go on a martyrdom mission targeting an fbi office or federal building filled with fbi agents." RODRIGUEZ also stated that he would "love" to go on a martyrdom mission to kill Jenna and Barbara Bush, and he would be "willing to do a martyrdrom mission to kill chelsea clinton and sasha and malia oabama."

29. Beginning in November 2012, FBI Employee #1 engaged in email correspondence with RODRIGUEZ. RODRIGUEZ used Subject Account 3 for the email communications with FBI Employee #1. The content of the emails sent by RODRIGUEZ to FBI Employee #1 is consistent with those he sent to the Obama Campaign, the Clinton Foundation, and the other recipients in May 2012, described above. In the emails, RODRIGUEZ complained of abuse and mistreatment he feels he received at Harbor-UCLA Medical Center; expressed a desire to have terrorists attack the United States, Clinton and his family, Bush and his family, and Obama and his family; offered his assistance to terrorists groups, such as Hezbollah, Hamas, and Al Qaeda, and in particular said that science courses he took in college would assist him in

¹⁸ I know from my training and experience, and publicly available information, that Al Qaeda in the Arabian Peninsula ("AQAP") is a designated Foreign Terrorist Organization; AQAP is a Sunni extremist group based in Yemen that has orchestrated numerous high profile terrorist attacks on the United States and United States interests. I know from reviewing issues of *Inspire* Magazine, from speaking with other law enforcement experts, and from publicly available information, that *Inspire* is published by AQAP, and that it dedicates portions of most editions to "how-to" instructions for creating explosives and other weapons and carrying out attacks. *Inspire* focuses on audiences living in Western nations and provides target selection and operational security suggestions.

making bombs; and expressed his desire to incite an attack against the United States with the use of chemical, biological, and nuclear weapons, and to die as a martyr. In his correspondence with FBI Employee #1, RODRIGUEZ also expressed the desire to perpetrate attacks using smallpox, a highly contagious and resistant virus that, according to the Centers for Disease Control and Prevention ("CDC"), is considered a potential bioterrorism agent.

30. In one of RODRIGUEZ's emails to FBI Employee #1, on November 29, 2012, he stated the following:

- a. "I would love to kill Bill Clinton and Hillary Clinton with a crowbar and smash all their bones into jelly. I would love to incinerate the house of George W. Bush with flame throwers, while he and his family are inside. I would take ghoulish pleasure in killing Barack Obama and his entire family with nerve gas or weaponized anthrax. He continues to torment me because Bill and Hillary Clinton have threatened him with assassination if he does not go along with their ideas...The world would be a much better place with Bill and Hillary Clinton DEAD!"

31. In another email to FBI Employee #1, on December 4, 2012, RODRIGUEZ wrote the following statements:

- a. "I want to BURN CHELSEA CLINTON ALIVE IN FRONT OF BILL AND HILLARY CLINTON THEN POISON THEM WITH POLONIUM RADIO ISOTOPE LIKE WHAT HAPPENED TO ALEXANDER LITVENIENKO. I WAS FINANCIALLY EVICTED BY KONSTANTIN GOLDENBERG AFTER HE HAD DINNER WITH GEORGE W. BUSH. I WANT TO POISON HIS DAUGHTERS WITH SMAL PDX OR POLONIUM, LIKE I WANT TO KILL SASHA AND MALIA OBAMA."
- b. "I was inciting Pakistan to kill Americans through regular mail from 2006 2007."
- c. "I began by contacting China in person at their consulate in Los Angeles in early 2000. I subsequently gave China a hit list of people to kill, including my family and former friends as well as people from Harbor/UCLA."
- d. "I have contacted many nations, including Iran, Syra, and Pakistan through regular mail and emails over the last 12-13 years."

32. On January 23, 2013, RODRIGUEZ emailed FBI Employee #1 and wrote:

- a. "I want to kill sasha and malia obama with my bare hands. i would love to beat them to death with a crowbar in front of the oreo boy barack obama. i would love to get barbara bush pregnant as she is and jenna bush and beat them to death with baseball bats in front of george w. bush then beat them all to death with my bare hands. i would love to murder them and spend hours beating them death and cracking open all their skulls. bill and hillary clinton should have all their bones broken before cracking open their skulls after they witnesses chelsea clinton beath to death with a tire iron."

33. Through the email correspondence, RODRIGUEZ advised FBI Employee #1 that he conducted reconnaissance and prepared attack plans on numerous targets, including the Federal Building in West Los Angeles, the World Trade Center in Long Beach, the Federal Building in Long Beach, Fort McArthur in San Pedro, police stations throughout the Los Angeles area, the Harbor-UCLA Medical Center in Torrance, the Los Angeles subway system, and the Los Angeles freeway system. RODRIGUEZ described how he would like to attack these targets employing "Mumbai-style"¹⁹ tactics and with the use of grenades, machine guns, explosives, nuclear devices, and chemical and biological agents. RODRIGUEZ also offered to scout additional targets in the South Bay and Los Angeles areas, and indicated that he is willing to work with terrorist organizations to make bombs.

34. In one of his emails to FBI Employee #1, on December 4, 2012, RODRIGUEZ stated that he had "scouted the World Trade Center in Long Beach and federal building next to it for attacks by Mujaheddin with grenades and machine guns." He continued as follows:

- a. "I have done extensive surveys of the subway system in the LA area for attacks with grenades, explosives, and possible chemical or biological agents. I have also poroposed plans to attack various police stations in the LA area and have also

¹⁹ I know from publicly available information that in November 2008, an Islamic terrorist group, Lashkar-e-Taiba, conducted twelve coordinated shooting and bombing attacks across Mumbai, India over the course of four days, in which 166 people were killed and over 300 people were wounded.

done extensive surveys of Fort McArthur in San Pedro. Some of these attacks can be carried out like Mumbai. However, I want to make one thing clear. I am not one of those people who go around shooting up the town as a crime of passion. I am doing this and am willing to help Mujaheddin in the SAME spirit as Timothy McVeigh did when he blew up a federal building in Oklahoma City, Oklahoma. I am willing to die in an martyrdom mission using explosives that could kill and mutilate Americans like Oklahoma City. What Hezbollah did to the Marine barracks in Lebanon in the early 80s was tremendous and glorious achievement by Mujaheddin. I would love to help Mujaheddin with my skills in chemistry and help them assemble bombs that would kill and mutilate Americans on a horrific scale.”

35. In an email to FBI Employee #1 on December 20, 2012, RODRIGUEZ elaborated on his plan to attack the Los Angeles subway system. RODRIGUEZ mentioned that his roommate had a friend who did security work for the Los Angeles subway system. According to the friend, most of the subway security camera operators spend their time looking at pornography instead of monitoring the security cameras. RODRIGUEZ said that he believed it would be easy to spread chemicals or biological diseases in the subway system.

36. In other emails to FBI Employee #1, RODRIGUEZ expressed a willingness to meet with “brothers” to help them conduct “violent Jihad.” He coordinated with FBI Employee #1 via email to meet on March 5, 2013 with a man he believed to be such a person. This individual actually was another FBI employee (“FBI Employee #2”). According to my discussions with FBI agents and Task Force Officers, and the FBI reports I reviewed of the meeting, when RODRIGUEZ met with FBI Employee #2, RODRIGUEZ discussed targeting multiple locations, including Fort MacArthur in San Pedro, California, the Federal Building in Long Beach, California, and the World Trade Center in Long Beach, California. RODRIGUEZ expressed his opinion to FBI Employee #2 about the best time to carry out an attack on the World Trade Center and the Federal Building in order to kill the most people. In addition, RODRIGUEZ told FBI Employee #2 several times during the meeting that he wanted “revenge”

and wanted to create "horror" from the attacks. RODRIGUEZ also stated he wanted to conduct an attack like "Timothy McVeigh." RODRIGUEZ mentioned about his background in chemistry and that he needed funding and materials to put together improvised explosive devices.

37. On March 21, 2013, RODRIGUEZ emailed FBI Employee #1 and volunteered "to take pictures of potential targets for attacks and load them on to my emails," adding, "I have flash sticks and plenty of CDs."

38. On April 13, 2013, RODRIGUEZ emailed FBI Employee #1 and stated, the following:

- a. "i will start tomorrow in taking pictures with his camera²⁰ at fort mac arthur and try to get the federal building pictures done soon after. these are targets i have been doing surveys on for quite a while. after i send u pix of these targets i will begin to photograph the other targets, like the israeli consulate, Torrance police and city hall, redondo beach police and city hall, santa monica police, LAX and airport police targets; and i will take ghoulish pleasure in photographing the federal building on sepulveda and wilshire...."

39. The FBI was notified that Department of Defense (DOD) Police conducted a pedestrian stop of RODRIGUEZ on April 21, 2013 when he was observed taking photographs of the Fort MacArthur perimeter walls and gates. RODRIGUEZ told the DOD Police he was a sketch artist and he was taking photos of the base because it is a historical location. The DOD Police officer asked RODRIGUEZ if he could see the photos he took and RODRIGUEZ agreed. The officer observed the photos were of the walls, gates, spikes on top of the wall, and a turnstile. None of the photos appeared to be artistic or of anything historical so the DOD Police officer requested RODRIGUEZ's permission to erase the photos and RODRIGUEZ agreed.

²⁰ In RODRIGUEZ's previous emails to FBI Employee #1, RODRIGUEZ mentioned using his roommate's camera to take the surveillance photographs.

40. RODRIGUEZ described this incident to FBI Employee #1 via email, stating that he was caught taking reconnaissance photos for possible “dirty bomb” or “Mumbai style” attacks on Fort MacArthur. RODRIGUEZ described where “mujahedeen” could obtain better vantage points of the military base while avoiding detection, and promised to do additional reconnaissance work on the federal building on Wilshire Boulevard and the World Trade Center in Long Beach.

41. On May 12, 2013, RODRIGUEZ emailed FBI Employee #1 a photograph depicting what he described as one of the corners of the Federal Building in Long Beach where a security camera was in operation. In the same email, RODRIGUEZ stated that this was only the first of a series of photos that he “plans to take on your behalf so that you will attack and kill federal agents and other American swines that terrorize the ummah and denigrate muslims.”

42. On May 15, 2013, RODRIGUEZ sent FBI Employee #1 three emails with twenty-two photographs of the World Trade Center and Long Beach Federal Building attached. In one of the emails, RODRIGUEZ stated, “the target would be easy to hit with a car loaded with a powerful bomb that would detonate the fueling station and hopefully cause an inferno that would set the entire block on fire.”

43. In another email from May 15, 2013, RODRIGUEZ stated the following:

- a. “I did this the Sunday after I was caught by department of defense police, taking pictures of fort mac Arthur. They were very disturbed because I had taken pix of all the entrances and they said it could be used for terrorism purposes. This was the Sunday after the mujaheddin struck these American pigs in boston on 4/15/13. I plan to go back and do more detailed photos for you and the brothers in the ummah so that you can develop a better plan of attack. I thought it would be most important to take pictures of the security cameras between the world trade center and the federal building. The bust stop in front of the federal building has security cameras, so I refrained from taking more pictures until I could delete the old ones so it would not attract attention. If I get caught taking pictures of the

federal buildings after getting caught at fort mac Arthur, it would arouse suspicion. I wanted to be extra careful after getting caught at fort mac Arthur and the military police telling me to my face they feared my pix of for mac Arthur could be used for terrorism. I am more determined than ever to go forward with the sheikh's plan to attack the usa."

44. On May 19, 2013, and May 21, 2013, RODRIGUEZ sent FBI Employee #1 two separate emails with a total of twenty-two photographs of the Long Beach performing arts center and the surrounding area. In the May 21, 2013 email, RODRIGUEZ stated, "I took photos of the front and side of the building to give mujaheddin shooting angles and possible places to plant bombs like the boston attack on 4/15/13."

H. Physical Surveillance of RODRIGUEZ

45. Since October 2012, the FBI, with assistance from LAPD and Torrance Police Department (TPD), has conducted numerous physical surveillances of RODRIGUEZ. According to the surveillance reports that I have reviewed, RODRIGUEZ's daily routine largely consists of going to various libraries throughout Los Angeles County and using the publicly available computers. RODRIGUEZ spends time on the computers composing emails and regularly prints out documents, including his emails, from the computers.

46. On November 29, 2012, TPD personnel initiated surveillance at SUBJECT PREMISES. TPD personnel observed RODRIGUEZ leave SUBJECT PREMISES at approximately 11:14 a.m. and walk to the Los Angeles Public Library located at 24000 Western Avenue, Harbor City, CA.

a. RODRIGUEZ sat down at computer terminal #3 and logged into his Yahoo email account. Shortly thereafter, RODRIGUEZ was observed writing an email. After

approximately an hour and half, a TPD detective observed RODRIGUEZ printing out several pages from the printer.²¹

b. The detective observed RODRIGUEZ leaving the location; RODRIGUEZ was seen carrying the papers he had printed out. TPD personnel followed RODRIGUEZ on foot and discontinued the surveillance after RODRIGUEZ was seen going into his mobile home park and towards SUBJECT PREMISES.

47. On December 26, 2012, TPD personnel initiated surveillance at SUBJECT PREMISES. TPD personnel observed RODRIGUEZ leave SUBJECT PREMISES and walk to the City of Lomita Library located at 24200 Narbonne Avenue, Lomita, CA.

a. RODRIGUEZ sat down on computer terminal #1 and logged into his Yahoo email account. As RODRIGUEZ was reading the email, he appeared elated and was pumping his fist. RODRIGUEZ then printed an email from the Yahoo account.

b. A TPD detective then saw RODRIGUEZ compose an email on the Yahoo account. At approximately 1:15 p.m., RODRIGUEZ printed an email from the Yahoo account.²² RODRIGUEZ continued using the computer for approximately 30 minutes but was seen constantly reading the earlier printed email from the Yahoo account.

c. RODRIGUEZ left the location at approximately 1:53 p.m. TPD personnel followed RODRIGUEZ on foot and discontinued the surveillance after RODRIGUEZ was seen going into his mobile home park and towards SUBJECT PREMISES.

²¹ As described above, RODRIGUEZ sent FBI Employee #1 an email on November 29, 2012 at 1:17 p.m. via his Yahoo email account. The email contained threats against various USSS protected individuals.

²² Based on the review of the email correspondence between FBI Employee #1 and RODRIGUEZ, I know that RODRIGUEZ sent an email from his Yahoo account to FBI Employee #1 on December 26, 2012 at 1:10 p.m. In the email, RODRIGUEZ proposed attacking the Jewish Center in Lomita, CA and "Mumbai-style" attacks on the Palos Verdes Shopping Mall and the Del Amo Mall in Torrance, CA.

48. Based on my training and experience and the above-described observations, I believe that RODRIGUEZ prints out and retains copies at SUBJECT PREMISES of his email communications, including communications relating to his desires to harm or kill USSS protected individuals.

VII. CONCLUSION

49. Based upon the facts set forth above, I believe there is probable cause to believe that LUIS RICARDO RODRIGUEZ has committed a violation of Title 18, United States Code, Section 879, knowingly and willfully threatening to kill or inflict bodily harm upon a former President or immediate family member of the President or of any former President. I additionally submit that probable cause exists for a search warrant allowing the search of SUBJECT PREMISES for the items to be seized as set forth in Attachment B.

JAY C. HUANG
Special Agent
United States Secret Service